

# EXHIBIT F

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 20, 2016

9:12 a.m.

C O N F I D E N T I A L

Deposition of [REDACTED] pursuant  
to notice, taken by Plaintiff, at the  
offices of Podhurst Orseck, 25 West  
Flagler Street, Suite 800, Miami, Florida,  
before Kelli Ann Willis, a Registered  
Professional Reporter, Certified Realtime  
Reporter and Notary Public within and  
for the State of Florida.

1 [REDACTED] - CONFIDENTIAL

2 BY MR. EDWARDS:

3 Q. When you got to his house, you were  
4 requested to give a massage?

5 MR. PAGLIUCA: Object to foundation and  
6 form.

7 THE WITNESS: I don't exactly remember. I  
8 don't remember if I was asked in the kitchen.  
9 I don't remember if -- I don't remember.

10 BY MR. EDWARDS:

11 Q. Massage was part of the game, though?

12 MR. PAGLIUCA: Object to form and  
13 foundation.

14 THE WITNESS: I don't remember. I'm  
15 sorry.

16 BY MR. EDWARDS:

17 Q. But even during this deposition today, we  
18 have described at times you giving him a massage?

19 A. Yes. You're asking about my first  
20 encounter, though.

21 Q. Sorry, I'm just trying to sum up the whole  
22 thing.

23 A. Okay.

24 Q. Was massage part of the lure to get you  
25 specifically to his house?

1 [REDACTED] - CONFIDENTIAL

2 A. Yes.

3 MR. PAGLIUCA: Object to form and  
4 foundation.

5 BY MR. EDWARDS:

6 Q. And at the time, you are 15, 16 or 17  
7 years old?

8 MR. PAGLIUCA: Object to form and  
9 foundation.

10 THE WITNESS: Yes.

11 BY MR. EDWARDS:

12 Q. No massage experience?

13 A. No.

14 Q. You were told to bring other girls to his  
15 house?

16 MR. PAGLIUCA: Object to form and  
17 foundation.

18 THE WITNESS: After a while, yes.

19 BY MR. EDWARDS:

20 Q. These massages were turned sexual by  
21 Jeffrey, as opposed to by anyone else?

22 A. Jeffrey took my clothes off without my  
23 consent the first time I met him.

24 Q. The massages were scheduled by people  
25 working for Jeffrey?

1 [REDACTED] - CONFIDENTIAL

2 A. I don't recall.

3 MR. PAGLIUCA: Object to form and  
4 foundation.

5 BY MR. EDWARDS:

6 Q. Jeffrey Epstein, during these massages,  
7 would use sex toys or have sex toys used?

8 MR. PAGLIUCA: Object to form and  
9 foundation.

10 THE WITNESS: Well, at that point, it's no  
11 longer a massage. Something else is going on.  
12 But, yes, he would take out adult toys and  
13 different things.

14 BY MR. EDWARDS:

15 Q. While you were a teenager, Jeffrey Epstein  
16 asked you to live with him?

17 A. Yes. He wanted me to be emancipated.

18 Q. Jeffrey Epstein encouraged girl-on-girl  
19 sex?

20 MR. PAGLIUCA: Object to form and  
21 foundation.

22 THE WITNESS: Yes.

23 BY MR. EDWARDS:

24 Q. And after you cooperated with the police,  
25 you were intimidated by people working for Jeffrey

1 [REDACTED] - CONFIDENTIAL

2 Epstein?

3 MR. PAGLIUCA: Object to form and  
4 foundation.

5 THE WITNESS: Yes.

6 MR. EDWARDS: All right. I don't have  
7 anything further for you. I apologize that we  
8 even had to go through this, all right?

9 THE WITNESS: Okay.

10 E X A M I N A T I O N

11 BY MR. PAGLIUCA:

12 Q. Ms. [REDACTED], by name is Jeff Pagluica. I  
13 live in Denver, Colorado. And, like you, I don't  
14 want to be here today either, okay? I would rather  
15 be in Denver.

16 I just want to -- as I understand it, and  
17 I'm not trying to get into any of your treatment  
18 over the last, let's say, 10 years, because I don't  
19 know how long it's been, but as I understand what  
20 you and your lawyer have said here today, you have  
21 been involved in some number of years of therapy, in  
22 which the purpose -- part of the purpose of the  
23 therapy has been to forget all of these events that  
24 Mr. Edwards was asking you questions about; is that  
25 correct?

1 [REDACTED] - CONFIDENTIAL

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA )

4 COUNTY OF MIAMI-DADE )

5

6 I, the undersigned authority, certify that  
[REDACTED] personally appeared before me and  
was duly sworn.

7 WITNESS my hand and official seal this  
23rd day of June, 2016.

8

9

10 Kelli Ann Willis, RPR, CRR  
Notary Public, State of Florida  
Commission FF928291, Expires 2-16-20

11 + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA )

14 COUNTY OF MIAMI-DADE )

15 I, Kelli Ann Willis, Registered  
Professional Reporter and Certified Realtime  
16 Reporter do hereby certify that I was  
authorized to and did stenographically report the  
17 foregoing deposition of [REDACTED] that a  
review of the transcript was not requested; and  
18 that the transcript is a true record of my  
stenographic notes.

19 I FURTHER CERTIFY that I am not a  
relative, employee, attorney, or counsel of any  
20 of the parties, nor am I a relative or employee of  
any of the parties' attorney or counsel connected  
21 with the action, nor am I financially interested  
in the action.

22 Dated this 23rd day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25